



Certification Policy Branch
Program Development Division
Food and Nutrition Service
3101 Park Center Drive
Alexandria, VA 22302

Re: Proposed Rule: Supplemental Nutrition Assistance Program: Requirements for Able-Bodied Adults without Dependents RIN 0584-AE57

To Whom It May Concern:

The Alliance to End Hunger engages diverse institutions to build the public and political will to end hunger at home and abroad. Our alliance of over 100 organizations and individuals includes national nonprofits, international NGOs, faith networks, corporations, universities and foundations. The Alliance to End Hunger opposes the USDA's proposed rule on requirements for Able-Bodied Adults without Dependents in the Supplemental Nutrition Assistance Program (SNAP). This rule change will unnecessarily increase hunger among our most vulnerable residents by restricting their ability to obtain SNAP.

We fully support work as a gateway to food security. However, the practice of tying nutrition support to work requirements is based on a faulty premise—that food insecure adults don't want to work or need to be incentivized to work, rather than acknowledging the barriers and economic realities that result in unemployment and underemployment. Proper nutrition is necessary to help workers stay healthy and productive, and is therefore necessary in their pursuit of finding and maintaining work. As the links between food insecurity and lower worker productivity are widely acknowledged, it is not only counterproductive to impose such time limits on workers; it is also costly to our economy.

Federal law already requires that states limit SNAP eligibility to just three months out of every three years for unemployed and underemployed adults without dependent children unless they can document 20 hours of work a week. USDA's proposed rule would undercut states' ability to waive these requirements in areas where jobs are scarce or the available jobs do not match workers' skills. State administrators are in the best position to understand the job markets in their localities and deem if the current work requirements are appropriate to their economic circumstances; therefore, we do not support the administration's proposed rule to tighten ABAWD time limits.

We call on USDA to provide a path to employment for SNAP recipients, not threaten to withhold needed food. The goal of increasing workforce participation among SNAP recipients who are able to work should be achieved through enhancing training opportunities and helping those with barriers to employment. We were encouraged to see these provisions strengthened in the recent Farm Bill and support USDA in accomplishing these goals.

Thank you for your consideration.

Sincerely,

Rebecca Middleton
Executive Director